

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FREIGHTQUOTE.COM, INC.,

Plaintiff,

v.

PACIFIC ATLANTIC FREIGHT,

Defendant.

Civil Action No. 1:08-cv-00823

Judge St. Eve  
Magistrate Judge Nolan

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**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT JUDGMENT**

On April 3, 2008, this Court entered an Order finding Defendant Pacific Atlantic Freight in default. Upon the Court's direction, Plaintiff Freightquote.com, Inc. seeks entry of default judgment of the claims and allegations set forth in its Complaint.

Specifically, Freightquote.com seeks Default Judgment of no less than **\$1,798,489** in actual damages. To the extent this Court finds it warranted (and only to the extent the Court does not award actual damages), Plaintiff respectfully elects statutory damages in the full amount permitted by statute: \$1,000,000. See 15 U.S.C. §§ 1117(a)-(c). Plaintiff also seeks reimbursement of **\$15,485.00** in attorneys' fees and **\$900.02** in costs. Finally, Plaintiff requests entry of a Permanent Injunction to prevent Defendant's continued infringement and to protect the relevant public from further confusion in the marketplace.

For the reasons set forth more fully in Plaintiff's supporting memorandum, declarations and exhibits submitted herewith, it is respectfully requested that the Court enter Judgment in favor of Plaintiff.

Respectfully submitted,

/s/ Raymond P. Niro, Jr.

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Attorneys for Freightquote.com, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on April 11, 2008, I caused the foregoing PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT JUDGMENT to be electronically filed with the Clerk of the Court using the CM/ECF system, and that copies were served upon Defendant as follows:

*by email and Federal Express to:*

Pacific Atlantic Freight  
c/o Any authorized agent or representative  
2899 Agoura Rd. Ste #310  
Westlake Village, CA 91361  
Fax: (805) 267-4835  
[info@freightshippingcenter.com](mailto:info@freightshippingcenter.com)

*by Federal Express to:*

Pacific Atlantic Freight  
c/o Dennis Gershman  
6167 Lake Lindero Dr.  
Agoura Hills, CA 91301

/s/ Raymond P. Niro, Jr.  
Attorney for Plaintiff